

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

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DEC 29 1997

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )  
 )  
Administration of the ) CC Docket No. 92-237  
North American Numbering Plan )  
Carrier Identification Codes (CICs) )

COMMENTS OF U S WEST, INC.

BellSouth Corporation ("BSC") recently filed a "Petition for Clarification," in the above-captioned proceeding.<sup>1</sup> In that Petition, BSC quoted from the Federal Communications Commission's ("Commission") language in its recently adopted CIC Reconsideration Order.<sup>2</sup> There the Commission stated that, by January 1, 1998, "all LECs [local exchange carriers] that provide equal access must have completed switch changes to recognize four-digit CICs [Carrier Identification Codes]."<sup>3</sup> Additionally, the CIC Reconsideration Order established a time from January 1 to June 30, 1998 for the preparation of other carrier networks and customer education regarding seven-digit Carrier Access Code ("CAC") dialing. After June 30, 1998, "only four-digit CICs and seven-digit CACs will be

<sup>1</sup> BellSouth Petition for Clarification filed Nov. 26, 1997 ("Petition").

<sup>2</sup> In the Matter of Administration of the North American Numbering Plan, Carrier Identification Codes (CICs), CC Docket No. 93-237, Order on Reconsideration, Order on Application for Review, and Second Further Notice of Proposed Rulemaking, rel. Oct. 22, 1997 ("CIC Reconsideration Order").

<sup>3</sup> Id. ¶¶ 4, 20.

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recognized.”<sup>4</sup>

BSC notes that BellSouth Telecommunications, Inc. (“BST”) “will have completed all changes necessary in its equal access switches to recognize four-digit CICs” by the mandated January 1, 1998 date.<sup>5</sup> However, BSC seeks clarification regarding the Commission’s mandate included in the second quoted sentence above, i.e., that having to do with CIC “recognition” after June 30, 1998. BSC notes that the process of blocking three-digit CICs is one that “can only be accomplished in a phased manner,” taking about two months.<sup>6</sup>

U S WEST, Inc. (“U S WEST”) will face the same factual situation as that described by BSC. However, we do not believe that a clarification of the Commission’s CIC Reconsideration Order is necessary to allow for the phased-in process described by BSC. In order for there to be a full permissive dialing period from January 1, 1998 through June 30, 1998, the phasing in of the blocking (or the recognition) of three-digit CICs cannot begin until July 1, 1998. And, as BSC notes, “[a]s a matter of engineering, three-digit CIC blocking cannot be flash-cut in each and every BST switch.”<sup>7</sup>

However, the phased-in blocking of three-digit CICs is of little regulatory, market or industry consequence. By July 1, 1998, individuals will be dialing four-digit CICs because they will have been previously advised that such dialing would

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<sup>4</sup> Id.

<sup>5</sup> Petition at 2.

<sup>6</sup> Id.

<sup>7</sup> Id. at n.5.

be required after June 30, 1998. For those few individuals who happen to dial a five-digit CAC<sup>8</sup> in a switch that has not yet been programmed to block the call, calls will go through. However, within weeks, a similar dialing attempt will fail. The “truth” of the prior education campaigns will prove itself in.

Nor will carriers be adversely affected by the phased-in process. No particular carrier’s customers will be able to be “advantaged” over other carriers, because the number of switches where the blocking has been implemented will continue to grow across the nation. Furthermore, customers utilizing CIC calling patterns are undoubtedly fairly spread out among carriers, leaving any customer of any carrier as likely to complete (or not) a call utilizing a three-digit CIC.<sup>9</sup>

For all of the above reasons, U S WEST did not read the Commission’s CIC Reconsideration Order to prohibit the type of phased-in approach described by BSC. Indeed, such phased-in network implementations are not uncommon. And, given the extremely limited and temporary nature of the phased-in deployment, U S WEST saw no conflict between the deployment and the Commission’s mandate.

Should the Commission disagree, however, U S WEST supports BSC’s Petition in its entirety, with the additional request that the “clarification” run to all affected LECs.<sup>10</sup>

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<sup>8</sup> BSC itself notes that such calling would be “inadvertent.” Id. at 3.

<sup>9</sup> As BSC notes, the three-digit CIC call completion environment would be “limited, arbitrary and temporary.” Id.

<sup>10</sup> Comments of MCI Telecommunications Corporation in Support of BellSouth’s Petition for Clarification, filed Dec. 4, 1997, at 2.

Should the Commission grant BSC's request for clarification, U S WEST sees no reason for the Commission to require LECs "to publicly disclose their pre-implementation and quality control plans," as suggested by MCI.<sup>11</sup> MCI presents no compelling evidence to support its requested mandate.

MCI claims that it needs Commission intercession -- *via* a formal regulatory mandate -- to protect it from the competitive disadvantage it might suffer if it remains in the dark about LECs' phased-in CIC blocking plans. Yet it never describes that disadvantage. Nor does it reconcile its acknowledgment of ongoing "industry group meetings"<sup>12</sup> (wherein MCI apparently first learned about the need for phased-in deployment) and its references to "coordination efforts . . . already underway [where] industry participants meet regularly to discuss the many details associated with accomplishing a smooth and orderly transition to [7-digit CAC] dialing, with as little customer confusion as possible"<sup>13</sup> with a presumed state of ignorance regarding LEC CIC blocking implementation. Both belie the need for further formal regulatory insinuation in the process.<sup>14</sup> For that reason, if the

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<sup>11</sup> Id. at 1.

<sup>12</sup> Id. at n.5.

<sup>13</sup> Id. at 4.

<sup>14</sup> MCI not only fails to make a case for carrier reporting in the first instance, but it provides no cost/benefit analysis that would support weekly reporting by carriers. Id. at 5. Carriers are always free to inquire or rely on reporting information already voluntarily provided by LECs through web sites or account managers or through some other type of reporting vehicles.

Commission deems it appropriate to issue a clarification around the issues raised by BSC, it should not include the requested regulatory relief sought by MCI as a condition.

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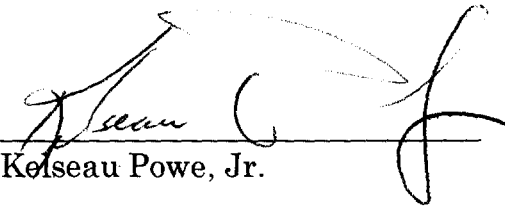
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December 29, 1997

## CERTIFICATE OF SERVICE

I, Kelseau Powe Jr., do hereby certify that on this 29<sup>th</sup> day of December, 1997, I have caused a copy of the foregoing **COMMENTS OF U S WEST, INC.** to be served, via first-class United States Mail, postage prepaid, upon the persons listed on the attached service list.



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(CC92237i-KK/ss)  
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